

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PURANJAY DAS, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiffs,

No. 1:16-cv-09572 (ALC)

-against-

RIO TINTO PLC, TOM ALBANESE, ALAN  
DAVIES, and SAM WALSH,

Defendants.

**DECLARATION OF JUSTIN S. NEMATZADEH IN SUPPORT OF  
LEAD PLAINTIFF'S OMNIBUS MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANTS RIO TINTO PLC, TOM ALBANESE, ALAN DAVIES, AND SAM  
WALSH'S MOTIONS TO DISMISS**

JUSTIN S. NEMATZADEH hereby declares pursuant to 28 U.S.C. § 1746:

1. I am an attorney in the law firm of Pomerantz LLP, counsel for Lead Plaintiff in this action. I am duly admitted to this Court.

2. Attached hereto are true and correct copies of the following documents, which are referenced in Lead Plaintiff's Omnibus Memorandum of Law in Opposition to Defendants' Motions to Dismiss the Amended Complaint for Violations of the Federal Securities Laws:

Exhibit 1: Excerpts of Rio Tinto plc's ("Rio Tinto") Form 6-K, Ex. 99.2, filed with the SEC on August 2, 2017, at F-22.

Exhibit 2: Excerpts of Rio Tinto's Form 20-F for 2011, filed with the SEC on March 16, 2012, Ex. 12.1.

Exhibit 3: *Mauss v. NuVasive, Inc.*, No. 13-cv-2005 JM (JLB), 2015 U.S. Dist. LEXIS 178117 (S.D. Cal. Aug. 28, 2015).

Exhibit 4: *Menaldi v. Och-Ziff Capital Mgmt. Grp. LLC*, No. 14-cv-3251 (JPO), 2016 U.S. Dist. LEXIS 60314 (May 6, 2016).

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
October 11, 2017

/s/ Justin S. Nematzadeh  
Justin S. Nematzadeh